

The Honorable Barbara J. Rothstein

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

D.S. by and through her next friend  
TARA URS; *et al.*,

Plaintiffs,

v.

WASHINGTON STATE  
DEPARTMENT OF CHILDREN,  
YOUTH, AND FAMILIES; *et al.*,

Defendants.

NO. 2:21-cv-00113-BJR

STIPULATION AND ORDER  
REGARDING  
AMENDMENT TO  
SCHEDULING ORDER

**I. STIPULATION**

The parties, by and through their respective attorneys of record, hereby stipulate to the following:

1. The parties agree that the pretrial schedule should be amended to accommodate the parties' mediation of this matter occurring during the last six months and continuing.

2. The parties agree that general pretrial dates be extended by approximately 90 days and that the dates specific to trial be extended by approximately 120 days as set forth below.

3. The parties agree that the current pretrial schedule (Dkts. #22, 61, 67, and 75) should be amended as follows:

- a. Reports from expert witnesses under FED. R. CIV. P. 26(a)(2) are to be served on or by April 7, 2022;
- b. Initial deadline for completed discovery is May 9, 2022;
- c. All dispositive motions are to be filed on or by June 10, 2022;
- d. Opposition for dispositive motions (per Dkt. #16 briefing schedule) is to be filed on or by July 1, 2022; and
- e. Replies for dispositive motions (per Dkt. #16 briefing schedule) are to be filed on or by July 15, 2022.

4. The parties agree that the current scheduling of trial-related dates (Dkts. #22, 61 and 67) should be amended by 120 days as follows:

- a. Motions in Limine shall be filed by August 30, 2022;
- b. The Joint Pretrial Statement shall be filed by September 6, 2022;
- c. The Pretrial Conference shall be set for September 20, 2022;
- d. The Trial (sixteen days) shall be set for October 4, 2022 or the next available date.

5. The parties agree that this Court should enter an order that approves and adopts this stipulation.

RESPECTFULLY SUBMITTED this 17th day of December, 2021.

PLAINTIFFS' COUNSEL

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Attorney General

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s/ Daniel J. Judge  
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16 *Attorneys for Plaintiffs*

## 17 II. ORDER

18 IT IS HEREBY ORDERED that:

- 19 1. The stipulation of the parties is APPROVED AND ADOPTED as follows:
- 20 2. The pretrial schedule (Dkts. #22, 61, 67, and 75) is AMENDED as follows:
  - 21 a. Reports from expert witnesses under FED. R. CIV. P. 26(a)(2) shall be  
22 served on or by April 7, 2022;
  - 23 b. The initial deadline for completed discovery is May 9, 2022;
  - 24 c. All dispositive motions shall be filed on or by June 10, 2022;
  - 25 d. Opposition for dispositive motions (per Dkt. #16 briefing schedule) shall  
26 be filed on or by July 1, 2022; and
  - e. Replies for dispositive motions (per Dkt. #16 briefing schedule) shall be  
filed on or by July 15, 2022.
3. The schedule of trial-related dates (Dkts. #22, 61 and 67) is AMENDED as  
follows:
  - a. Motions in Limine shall be filed by August 30, 2022;

- b. The Joint Pretrial Statement shall be filed by September 6, 2022;
- c. The Pretrial Conference shall be set for September 20, 2022.
- d. The Trial (sixteen days) shall be set for October 4, 2022.

The Clerk is directed to forward copies of this Order to the parties in this matter.

Entered this 22nd day of December, 2021.



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BARBARA J. ROTHSTEIN  
UNITED STATES DISTRICT JUDGE